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June 6, 2007

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Notice of Oral Ex Parte Communication, In the Matter of Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission's Rules, WCB Docket 99-200**


Dear Ms. Dortch:

On June 5, 2007, the undersigned as counsel, together with Timothy Lorello, Senior Vice President of TeleCommunication Systems, Inc. ("TCS"), met with Scott Deutchman, Legal Advisor to Commissioner Copps on competition and universal services.

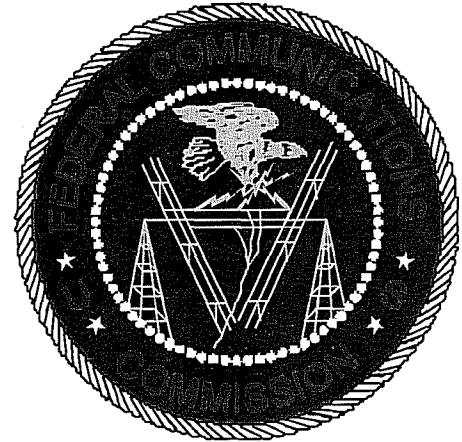
Petitioner discussed why the Federal Communications Commission's grant of the above-referenced petition is necessary to ensure the continued efficient provision and deployment of VoIP E911 service. The Petitioner also discussed why other approaches will result in a process that is both time consuming and inefficient.

Pursuant to the Commission's rules, 47 C.F.R. § 1.1206(b) (1), this letter, along with the material distributed at the meeting, is being filed electronically for inclusion in the record of the above-referenced proceeding.

Respectfully submitted,

  
Rudy Baca  
Counsel to TeleCommunication Systems, Inc.

Attachment  
cc: Scott Deutchman



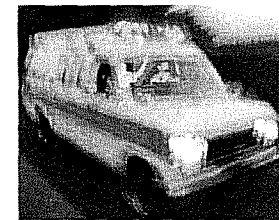
# p-ANI Assignment Challenges: Petition for Waiver

Timothy Lorello  
Sr. Vice President, Chief Marketing Officer

**June 5<sup>th</sup>, 2007**



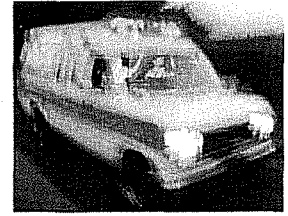
# Petition For Waiver



- TCS filed a Petition for Waiver
  - Petitioners provide support for significant VoIP coverage
  - As VPC, Petitioners acquired ESQKs following NENA model
    - Efficient use of ESQK numbering resources
    - Reduced testing required by PSAPs
    - Increased reliability due to fewer provisioned systems
    - Faster nationwide deployment for VoIP subscribers
  - Navin Letter indicated that CLEC registration is required
    - In every state in which service is offered (i.e., all 50 states)
  - Without waiver, Petitioners could be restricted from getting ESQKs
    - Petitioners are not CLECs and do not have nationwide registrations
  - Petitioners requested a continuation of the current model
- FCC has instructed Neustar to continue providing ESQKs for the interim
- Intrado filed comments on the Petition for Waiver



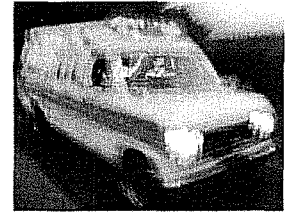
# Intrado's Counterpoints



- Unprecedented velocity of VoIP deployments
  - Attributable to p-ANI access
- States have a vital interest in p-ANI resources and wish to regulate them
- Users of p-ANI need to have high integrity and subject to state level certifications
- Intrado is CLEC certified in 34 states & will obtain certifications where required
- Waiver is too broad
  - Waivers should be case-by-case where states are not granting CLEC status



# Discussion

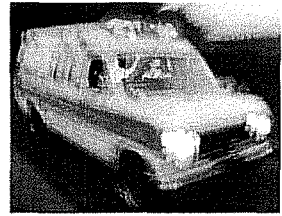


- Unprecedented velocity of VoIP deployments
  - Attributable to p-ANI access
- Petitioners agree that unprecedented VoIP deployments have been due to all having access to the p-ANIs

300



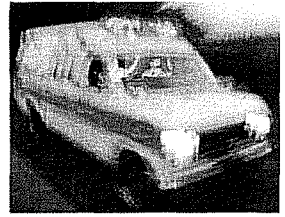
# Discussion



- States have a vital interest in p-ANI resources and wish to regulate them
- Petitioners point out that FCC has ruled that VoIP internet access is to be regulated at the Federal level



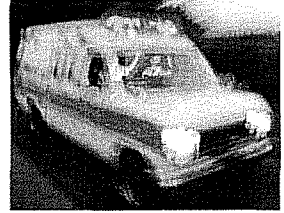
# Discussion



- Users of p-ANI need to have high integrity and subject to state level certifications
- Petitioners have demonstrated the required level of integrity and have obtained CLEC registration in at least one state



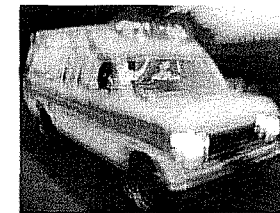
# Discussion



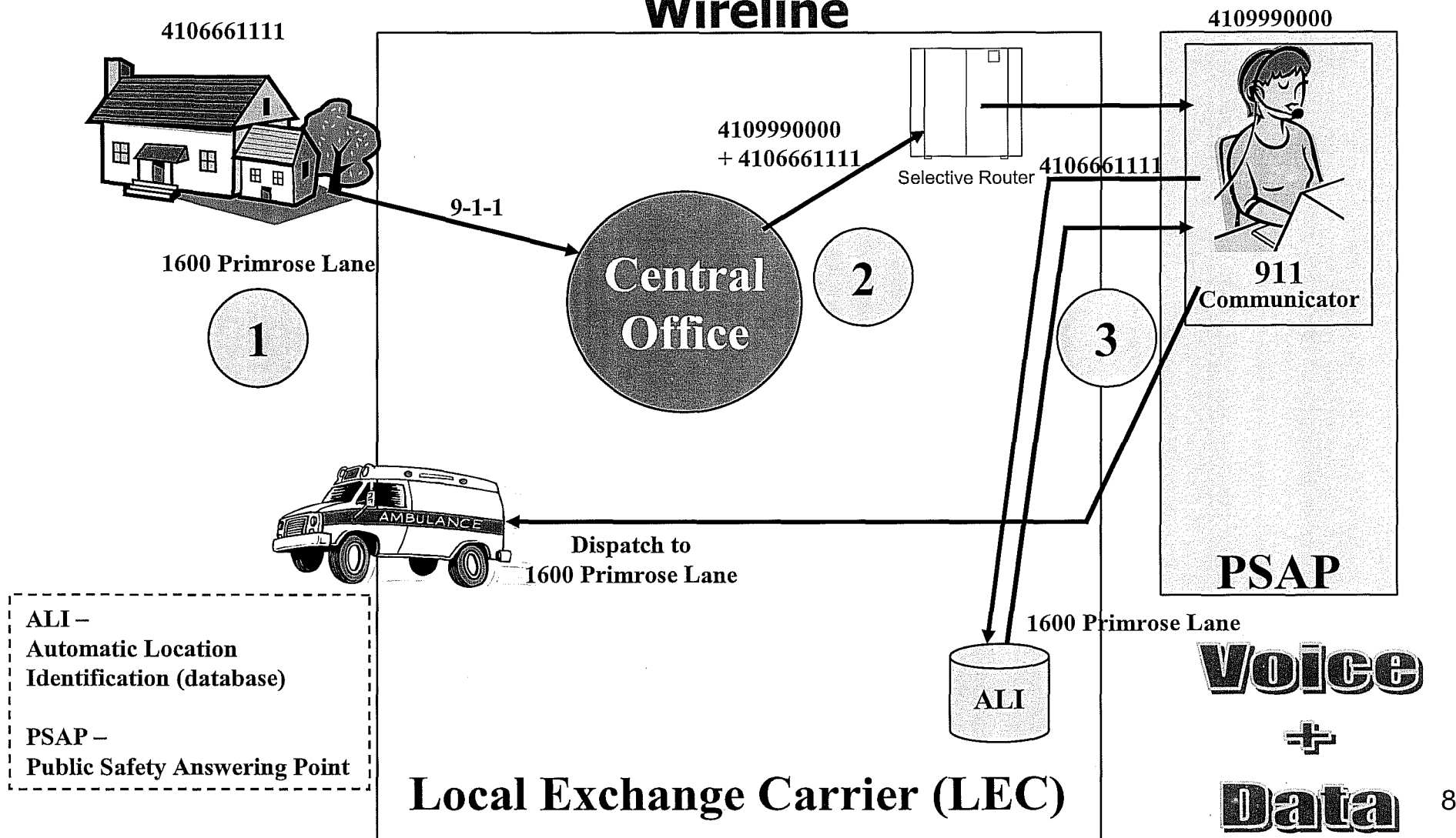
- Intrado is CLEC certified in 34 states & will obtain certifications where required
- Petitioners believe this is an illustration of the different business models that VoIP has stimulated



# Wireline E9-1-1 Success

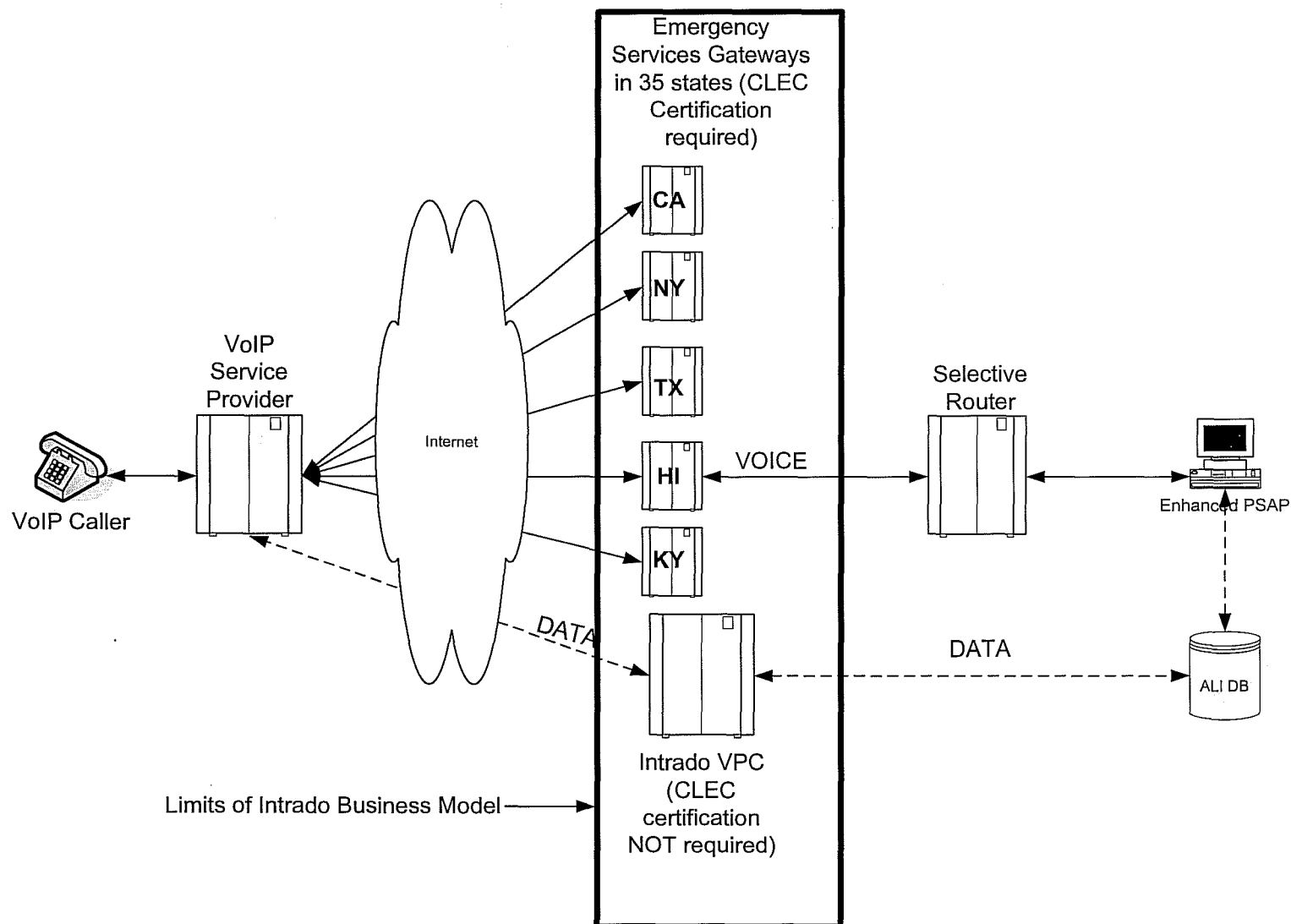
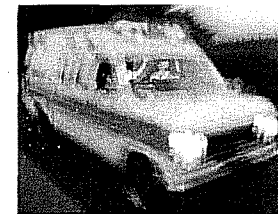


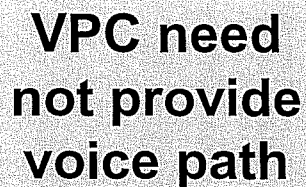
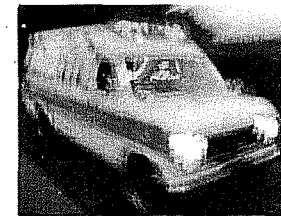
## Wireline





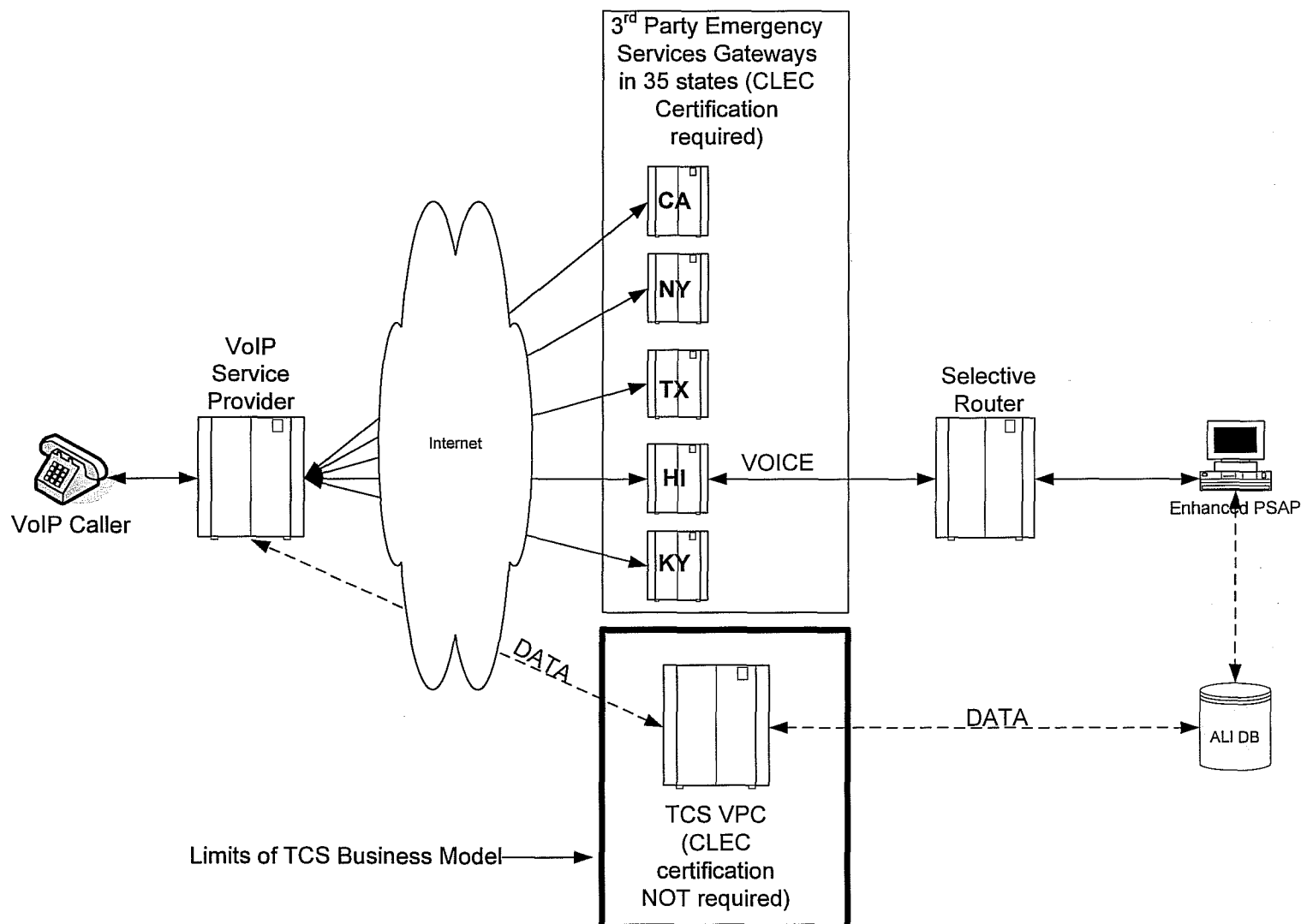
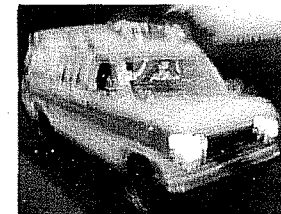
# Intrado Model





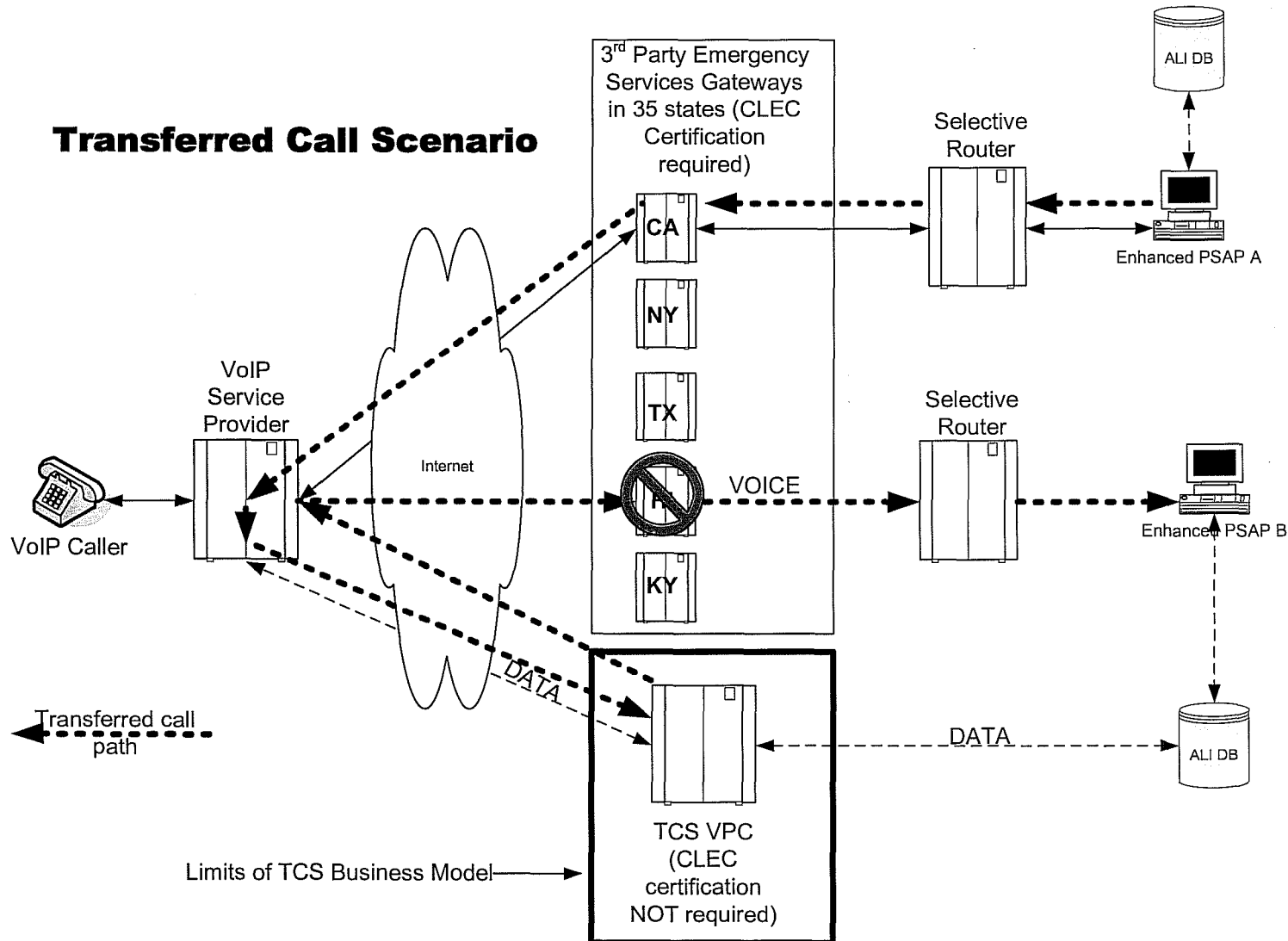
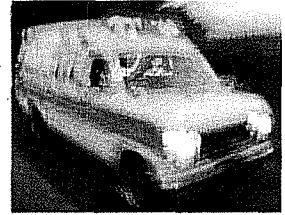


# TCS/HBF Model



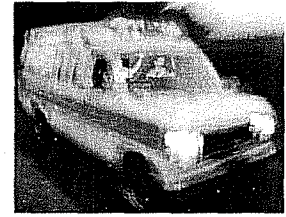


# Impact on Call Transfers





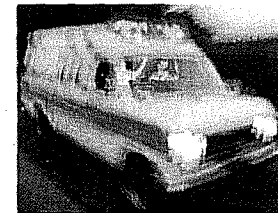
# Discussion



- Waiver is too broad
  - Waivers should be case-by-case where states are not granting CLEC status
- Petitioners believe that such an approach would be time consuming, inefficient, and inappropriate for a service regulated at the Federal level



# Future Course



## Petitioners believe:

- That the current approach to p-ANI assignment has assisted in the very rapid VoIP E9-1-1 deployments
  - That our current successes are a demonstration of commitment to integrity and prudent use of resources
  - That VoIP, as expected, is introducing new business models
  - That the requested waiver continues to have merit
- 
- We respectfully request that the waiver be granted



# Questions

## **Tim Lorello**

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## **Dick Dickinson**

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